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5 *Representing the United States of America*

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| CLERK US DISTRICT COURT | |
| DISTRICT OF NEVADA | |
| BY: | DEPUTY |

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9 **UNITED STATES OF AMERICA,**

CRIMINAL INDICTMENT

10 Plaintiff,

Case No. 2:18-cr- 255

11 vs.

VIOLATIONS:

12 **CHARLES ELLIS,**

Engaging in the Business of Dealing
in Firearms Without a License –
18 U.S.C. §§ 922(a)(1)(A); 924(a)(1)(D)

13 Defendant.

14 Transfer or Sale of Firearm to a Non-
Resident – 18 U.S.C. §§ 922(a)(5);
924(a)(1)(D)

15
16 **THE GRAND JURY CHARGES:**

17
18 **COUNT ONE**

19 **Engaging in the Business of Dealing in Firearms Without a License**
(Title 18, United States Code, Sections 922(a)(1)(A); 924(a)(1)(D))

20 From at least on or about January 1, 2016, through on or about February 1, 2018,
21 in the District of Nevada and elsewhere,

22 **CHARLES ELLIS,**

1 the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer
 2 of firearms under Title 18, United States Code Section 923, did willfully engage in the
 3 business of dealing in firearms, in violation of Title 18, United States Code, Sections
 4 922(a)(1)(A) and 924(a)(1)(D).

5 **COUNT TWO**

6 **Transfer or Sale of Firearm to a Non-Resident**
 7 **(Title 18, United States Code, Sections 922(a)(5); 924(a)(1)(D))**

8 From at least on or about January 22, 2017, through on or about December 4,
 9 2017, in the District of Nevada and elsewhere,

10 **CHARLES ELLIS,**

11 the defendant, not being a licensed importer, licensed manufacturer, licensed dealer or
 12 licensed collector of firearms, did knowingly and willfully transfer, sell, transport and
 13 deliver firearms to a person other than a licensed importer, licensed manufacturer,
 14 licensed dealer, or licensed collector of firearms, to wit:

| <u>Firearm Sold</u> | <u>Date of Sale</u> | <u>Buyer</u> | <u>Buyer's State of Residence</u> |
|---|----------------------------|---------------------|--|
| Marlin, 1895 GBL, .45-70, Serial #: MR93513F | January 22, 2017 | S.G. | Texas |
| Tanfolglio, F.LLI, S.N.C., Witness Pavona, 9mm, Serial #: MT36545 | February 5, 2017 | E.S. | Arizona |
| SCCY Industries, LLC, CPX, 9mm, Serial #: 477786 | February 5, 2017 | E.S. | Arizona |
| Smith & Wesson, SD9, 9mm, Serial #: FXZ9322 | February 5, 2017 | E.S. | Arizona |

| | | | | |
|---|--|------------------|------|------------|
| 1 | Masterpiece Arms, MPA30T, 9mm, Serial #: FX04118 | December 4, 2017 | A.R. | California |
|---|--|------------------|------|------------|

3 knowing and having reasonable cause to believe that such person did not reside in the
 4 state in which the defendant resided, to wit: Nevada, in violation of Title 18, United
 5 States Code, Sections 922(a)(5) and 924(a)(1)(D).

6 **FORFEITURE ALLEGATION**

7 **Engaging in the Business of Dealing in Firearms Without a License and
 8 Transfer or Sale of Firearm to a Non-Resident**

9 1. The allegations of Counts One and Two of this Criminal Indictment are hereby
 10 realleged and incorporated herein by reference for the purpose of alleging forfeiture
 11 pursuant to Title 18, United States Code, Section 924(d)(1) with Title 28, United States
 12 Code, Section 2461(c).

13 2. Upon conviction of any of the felony offenses charged in Counts One and Two
 14 of this Criminal Indictment,

15 **CHARLES ELLIS,**

16 defendant herein, shall forfeit to the United States of America, any firearm or
 17 ammunition involved in or used in any knowing violation of Title 18, United States Code,
 18 Section 922(a)(1)(A) and 922(a)(5):

- 19 1. Zhongzhou Machine works 12 gauge shotgun, SN: JW12-24318;
- 20 2. Taurus PT22 .22 pistol SN: 63613Z;
- 21 3. Hi-Point .380 pistol, SN: 8922466;
- 22 4. Chiappa Firearms Model 1911-22 .22 caliber, SN: 17E03932;
- 23 5. American Tactical M1911 Military .45 Pistol, SN ML12689;

6. Magnum research Desert Eagle, SN: DK0024994;
7. Marlin Arms Model 39-A, SN: B5936;
8. Chiappa Firearm Model 1892, Mare's Leg pistol, SN: 14C71475;
9. Tristar Setter 12 gauge shotgun, SN: KRU035392;
10. Ruger Bushmaster .450 Rifle, SN 697-59251;
11. Kimber Micro 9, 9 mm handgun, SN PB0042989; and
12. Any and all ammunition

All pursuant to Title 18, United States Code, Section 922(a)(1)(A) and 922(a)(5) and Title 18, United States Code, Section 924(d)(1) with Title 28, United States Code, Section 2461(c).

DATED: this 22nd day of August, 2018.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DAYLE ELIESON
United States Attorney

PATRICK BURNS
Assistant United States Attorney